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April 19, 2023

VIA ECF

Jennifer L. Rochon, U.S.D.J.
United States Courthouse
Courtroom 20B
500 Pearl St.
New York, NY 10007-1312

**Re: Kaul v. Intercontinental Exchange
Docket No. 1:23-cv-02016-JLR**

Dear Judge Rochon:

This law firm represents defendant Allstate Insurance Company (“Allstate”), and we have represented Allstate in numerous other actions filed by Plaintiff Kaul against Allstate and other defendants in this action. We write to respectfully request that the Court dismiss Kaul’s Complaint based on the anti-filing injunction entered by Judge Oetken on September 12, 2022 in Kaul v. Intercontinental Exchange, Civil Action No. 21-cv-6992-JPO (DE 168).

Plaintiff Kaul has filed over a dozen *pro se* actions against Allstate (which also included other defendants in this action), all arising out of the revocation of his license to practice medicine in New Jersey by the New Jersey Board of Medical Examiners. Plaintiff Kaul has brought four actions in the Southern District of New York (not including this action), two in the District of Columbia, two in the Northern District of Georgia, the District of Connecticut, the District of Massachusetts, the Northern District of Texas and the Northern District of Illinois. Other than this action, all have been dismissed.

The most recent dismissal order was entered by Judge Oetken in Kaul v. International Exchange, Civil Action No. 21-cv-6992-JPO (DE 168), in which the court outlined the series of frivolous litigations initiated by plaintiff Kaul. Judge Oetken’s Opinion and Order (DE 168) also granted the motions by Allstate and other defendants for the entry of a nationwide anti-filing injunction. Specifically, the Court’s order provides:

From the date of this Opinion and Order, Plaintiff Kaul is barred from filing in any United States district court any action, motion, petition, complaint, or request for relief against any of the Defendants named in this litigation that relates to or

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arises from (i) the denial of his medical license; (ii) subsequent litigation proceedings initiated by the Defendants here before the date of this Order; (iii) subsequent litigation proceedings initiated by Plaintiff Kaul before the date of this Order; without first obtaining leave from this Court. Any motion for leave must include the caption “Request for Permission to File under Filing Injunction” and must be submitted to the Pro Se Intake Unit of this Court along with Plaintiff Kaul’s proposed filings.

If Plaintiff Kaul violates this Opinion and Order and files any materials without first obtaining leave to file, any request will be denied for failure to comply with this Opinion and Order, and Plaintiff Kaul may be subject to sanctions, including monetary penalties or contempt. *See Schuster*, 2021 WL 13173 70, at *11. The Court clarifies that this filing injunction does not prevent Kaul from filing an appeal from this Opinion and Order.

Plaintiff Kaul’s current Complaint repeats the same allegations as those made in the Kaul v. Intercontinental Exchange case before Judge Oetken, as well as in virtually all of his prior lawsuits. The filing of the Complaint in this action by Plaintiff Kaul therefore directly violates the anti-filing injunction entered by Judge Oetken and we respectfully request its dismissal on that basis.

Respectfully submitted,

/s/ David J. D’Aloia

DAVID J. D’ALOIA

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cc: Magistrate Judge Ona T. Wang
Richard Arjun Kaul